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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EX PARTE

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, DC 20554

Re: CC Docket No. 92-237, North American Numbering Plan; IAD File
No. 94-102 and IAD File No. 94-104

Dear Mr. Caton:

Pacific Bell wishes to address two key issues related to CC Docket No. 92-237: (1) transfer of the NANPA and (2) central office code administration. We also take this opportunity to submit a copy of a letter we wrote to the CPUC, in response to a proposal regarding area code 818. That proposal was filed in this docket on June 12, 1995 by Cox Enterprises.

Transfer of the NANPA

Pacific Bell supports the transfer of the NANPA to an independent body. We strongly supported the transfer of the NANPA to the Alliance of Telecommunications Solutions, (ATIS), rather than create a completely new organization as suggested by others, including CTIA. Transfer of the NANPA to an existing association will allow a faster and more efficient transition process.

The NANPA-sponsored Future of Numbering Forum has, on many occasions, discussed the capabilities that will be needed by the future administrator of the NANPA. Only ATIS consistently met the criteria put forth of the industry. Issues related to international membership and structure presented, for some, obstacles to total support for ATIS. ATIS, however, has sufficient flexibility in its committee structures and a history of significant industry participation to deal with any unresolved issues in an expeditious manner.

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Central Office Code Administration

Pacific Bell has significant concerns related to the transfer of central office code administration to a national organization. California, along with the rest of the nation, will be experiencing significant growth in the next 10 years. Three Number Plan Areas (NPAs) (310, 818, and 619), are already in relief planning stages. Three more NPAs will begin relief planning in 1996 and several more NPAs will require relief by the year 2005.

This explosive growth requires attentive code assignment and activation, tracking and forecasting, and expeditious preparation for code relief planning. Pacific Bell believes that these functions cannot be effectively centralized at a national level without losing a significant measure of responsiveness to the communities involved. The resources needed to deal with California alone, where urban areas require multiple NPAs, would significantly burden the resources of a national administration.

In California, NPAs are an urban issue, (e.g., Los Angeles with 310, 562, 213, and 818). Consumers, communities, and political leaders must be included in the process of code relief planning. Code administration requires a local knowledge of authorized carriers, service areas, calling areas, local technology, services, urban and rural communities, economic and business trends. This local knowledge is critical to accurate forecasting and skillful code relief planning. A national central office code administration would be hard pressed to maintain the resources and local presence needed by high growth states. Consequently, Pacific has recommended to the California Public Utilities Commission a transfer be made to an administrative body at a state level.

In IAD 94-102, the Commission agreed:

“We conclude this discussion of jurisdiction, however, by restating our recognition that state regulators clearly have legitimate interests in the administration of the NANP. We would expect that they continue to exercise regulatory supervision over the NANP as it affects intrastate telecommunications just as we intend to continue exercising our regulatory authority to resolve NANP issues clearly of interstate concern. We will continue to monitor the administration of the NANP to assure that our goals are being met.”

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In the area of code relief planning the CPUC has exercised regulatory supervision. A state administrator of central office codes, working with the CPUC, would better serve the telecommunications industry and the consumer.

Area Code 818

On June 12, 1995, Cox Enterprises filed in this docket a proposed relief plan for area code 818. That proposal, signed by various telecommunications companies, had been submitted to the CPUC. We attach to this letter a copy of our response to the Cox proposal.

Please associate this material with the above-referenced proceeding. We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please call me if you have any questions regarding this letter.

Sincerely,



Alan F. Ciamporcero
Executive Director

Attachment

cc: Linda Dubroof
Marian Gordon

June 28, 1995

Mr. Neal Shulman
Executive Director
California Public Utilities Commission
505 Van Ness Avenue, Room 5222
San Francisco, CA 94102

Re: Relief Planning for Area Code 818

Dear Mr. Shulman:

On June 20, a meeting was held among James Greig, Robert Feraru, Betty Brandel, and Cherrie Conner of your staff and Pat Lanthier and Andrea Cooper of Pacific Bell. The purpose of this meeting was to clarify matters concerning Pacific Bell's relief planning for the 818 area code after confusion was created when the Area Code Relief Coalition ("ACRC") issued its proposal and press release on June 12. This letter confirms the course that Pacific Bell will take, as the Area Code Relief Coordinator, following our June 20 meeting. It also reaffirms our commitment to inform and to minimize confusion for the diverse customer population served by the 818 area code.

As you know, public involvement, public notification, and public awareness of area code relief measures must be included as part of any area code relief program. The majority of industry participants – including Pacific Bell – favor an approach under which the Area Code Relief Coordinator would notify the public and make it aware of two alternative relief measures – a split alternative and an overlay alternative – so the public could become involved in commenting on both. ACRC, representing a minority of industry participants in the 818 area code relief effort, disagrees and has proposed that only a split proposal be presented. We disagree with ACRC because we believe that the public must not be denied the opportunity to understand and comment on any viable alternative relief measure and its implications for them as consumers.

ACRC has now created unnecessary public confusion by publicly announcing its own proposal without seeking the cooperation of the rest of industry. In their haste to announce their proposal, ACRC issued a press release which says that it plans to put the new area code in the San Fernando Valley. The actual proposal ACRC sent to the Commission says that the new area code will go into the San Gabriel Valley – the opposite of what was described to the public in ACRC's press release. This confusion was unnecessary and could have been avoided, if only ACRC had been more willing to

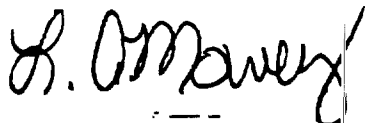
cooperate with other industry participants who are more knowledgeable about the 818 area.

The Commission should not be misled into believing that the majority of participants in the May 2 Industry meeting somehow agreed to ACRC's stipulation document to present only one proposal -- a split proposal -- to the public. No such agreement was ever reached. The ACRC stipulation document was discussed in the meeting for a brief time and then tabled. The majority favored a proposal to take both an overlay alternative and a split alternative to the public.

As the Area Code Relief Coordinator, Pacific Bell will go forward on July 17 with the rest of industry to fully define an overlay alternative to be presented, along with the split alternative, when Pacific Bell conducts the public meetings that it is required to conduct for 818 under CPUC Section 7930. We will ensure that both alternatives -- the split and the overlay -- are presented in as fair, reasonable, and neutral a manner as possible.

From the conclusion of our meeting on June 20, we understand that no action by the Commission is planned in response to ACRC's letter of June 12. Accordingly, as the Area Code Relief Coordinator, Pacific Bell will go forward to meet its responsibility to conduct public meetings and, thereafter, to file a plan at least 15 months before the introduction of a new area code to relieve 818.

Very truly yours,



LYNN A. MOWERY
Acting Regulatory Vice President